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June 2, 2005

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Nordia, Inc. Annual Progress Report Regarding Waived TRS Standards
for Internet Protocol (IP) and Video Relay Service (VRS)
CC Docket No. 98-67

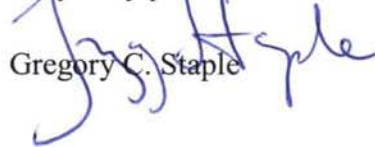
Dear Ms. Dortch:

Nordia, Inc. (Nordia) hereby files its Annual IP Relay and VRS Progress Report, as required by the Commission.¹ The Commission should be aware, however, that Nordia does not currently provide VRS and hence its report only addresses IP Relay Services. On May 2, the staff of the Consumer and Governmental Affairs Bureau extended the time for Nordia to file this report until June 2, 2005.

If you have any questions concerning this report, please contact me.

Very truly yours,

Gregory C. Staple



Attachments

cc: Thomas Chandler
Gregory Hlibok

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¹ *In the Matter of Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities and Americans with Disabilities Act of 1990*, Second Report and Order, Order on Reconsideration, and Notice of Proposed Rulemaking (Second Report and Order), CC Docket No. 98-67 and CG Docket No. 03-123 (FCC 03-112), released June 17, 2005.

**2005 Nordia, Inc. Annual Progress Report on
Meeting Waived Standards for IP Relay Services**

	Waived items and text of TRS standard	Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
1.	Speech to Speech (STS) "Speech-to-speech relay service and interstate Spanish language relay service shall be provided by March 1, 2001."	The absence of widespread broadband residential connections and interoperable VoIP software make STS infeasible at this time.	Nordia is evaluating several VoIP services to determine acceptable QoS levels to support STS calls.
2.	Types of Calls (VCO, HCO, VCO-to-TTY, HCO-to-TTY, VCO-to-VCO, HCO-to-HCO) "TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO."	See STS response <i>supra</i> .	See STS response <i>supra</i> .
3.	Emergency Call Handling "Provider must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP."	IP Relay providers do not have originating automatic numbering information (ANI) data for a calling party and hence can not reliably determine the location of the caller in order to route an IP Relay call to the nearest Public Service Answer Point (PSAP).	Nordia routinely relays "911" calls and finds the proper PSAP for TRS calls using caller-id. Nordia can also process a 911 call on an IP relay inbound providing that the caller can give a valid phone number related to his/her location. Nordia can handle and relay a 911 IP relay if the connectivity is kept alive. If it fails, Nordia could relay the phone number provided by the caller for emergency support at the related civic address.
5.	Pay-per-call (900) service "Relay services shall be capable of handling pay-per-calls."	IP networks do not supply ANI data which is commonly required for billing purposes. Also, many 900 number services terminate to recorded announcements requiring voice interaction. For these reasons, Nordia does not currently process 900 number calls.	Nordia is reviewing the technical challenges of providing interoperable voice service and pay-per-call billing via the Internet. A solution is not expected before 2007, at earliest.

	Waived items and text of TRS standard	Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
6.	<p>Call Release</p> <p>“TRS providers are required to provide call release functionality. Call release is defined as a “TRS feature that allows the CA to sign-off or be ‘released’ from the telephone line after the CA has set up a telephone call between the originating TTY caller and a called TTY party, such as when a TTY user must go through a TRS facility to contact another TTY user because the called TTY party can only be reached through a voice-only interface, such as a switchboard.”</p>	<p>An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialed voice call utilizing Signaling System 7 (SS7). Since these two types of calling platforms are not compatible, the call release feature is not technically feasible.</p>	<p>This feature was not a requirement for the only state RFP won by Nordia to date for IP relay. The IP and the TTY protocols are not able to connect together easily. Hence, it is not technically feasible today to provide the call release features other than through a relay agent. However, Nordia will continue to investigate new developments to allow its customers to use this feature.</p>
7.	<p>Three-way Calling</p> <p>“TRS providers are required to provide three-way calling functionality. Three-way calling is defined as a “TRS feature that allows more than two parties to be on the telephone line at the same time with the CA.”</p>	<p>The current Internet Relay call environment does not support the capability to perform three-way calling initiated by a CA. But Nordia’s service does not interfere with three-way calling services provided by a LEC.</p>	<p>This call service requirement is met if a customer subscribes to a LEC’s three-way calling service and the relay provider does not interfere with the functionality of the service and Nordia’s relay service does not do so.</p>
8.	<p>Speed Dialing</p> <p>“TRS providers are required to provide speed dialing. Speed dialing is defined as a “TRS feature that allows a TRS user to place a call using a stored number maintained by the TRS facility. In the context of TRS, speed dialing allows a TRS user to give the CA a short-hand name or number for the user’s most frequently called telephone numbers.”</p>	<p>There are no limitations today. Nordia currently offers this feature.</p>	<p>The customer can use the speed dialing feature via a special request. Customers can enter the phone number on the web prior to the call. The phone number will be pre-populated to agent’s dialing window for efficient call processing.</p>